

LEVINE & BLIT, PLLC  
Attorneys at Law

800 WESTCHESTER AVENUE, S-322  
RYE BROOK, NY 10573  
PHONE: (212) 967-3000 - FAX: (212) 967-3010  
[www.levineblit.com](http://www.levineblit.com)

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October 6, 2023

***VIA ECF***

United States District Court  
Honorable Cheryl L. Pollak  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Ugwudiobi et al. v. Int'l Trendz, LLC, et al.* – No. 1:22-cv-4930  
*Odom, et al. v. Int'l Trendz, LLC, et al.* – No. 1:23-cv-828**  
**Status Report**

Dear Magistrate Judge Pollak,

This firm, along with Bashian & Papantoniou, P.C., represent plaintiffs Odom and Jackson in the above-referenced civil action. Pursuant to the Court's Electronic Order dated September 6, 2023 concerning the status of discovery, including the issues raised in the Odom plaintiffs' pending discovery motion (ECF Docket #24), please accept this correspondence as the Status Report requested by the Court.

On July 6, 2023, Erik Bashian, Esq. filed a request for a pre-motion conference identifying multiple discovery deficiencies by defendants that had not been cured. To date, defendants have produced supplemental discovery, but it has failed to cure the deficiencies in the request for a pre-motion conference. Notably, the following still remains outstanding: (1) Complete time records and time sheets; (2) Work schedules; (3) Employee Handbooks; (4) Job descriptions; (5) Notices pursuant to New York Labor Law § 195(1); (6) Cash App (or other similar money transfer applications) transfer to employees; (7) Complaints by employees about non-payment of wages; (8) Communications between your clients and the U.S. Dep't of Labor concerning non-payment of wages or any investigation into non-payment of wages; (9) Identification of shareholders of International Trendz, LLC; (10) A class list; (11) Unredacted class discovery (i.e. time records, payments, etc.) and (12) A privilege log for all redacted or withheld documents.

As a result, on October 2, 2023, the undersigned sent, by email, a letter addressed to defendants' counsel, Ian E. Smith, Esq., identifying the issues raised in Mr. Bashian's July 6, 2023 request for a pre-motion conference and requesting that Mr. Smith identify times before the end of business hours on October 5, 2023 where he would be available for a telephone call to discuss the outstanding issues. Mr. Smith has not yet responded to the October 2, 2023 email or

correspondence, produced additional documents or information, or identified times where he was available by telephone.

As such, it is the position of plaintiffs Odom and Jackson that the issues raised in the July 6, 2023 request for a pre-motion conference remain open. Thank you for the Court's time and attention to this matter.

Respectfully submitted,

LEVINE & BLIT, PLLC



Justin S. Clark